

Fill in this information to identify your case:

United States Bankruptcy Court for the:

Northern District of Illinois

Case number (If known): _____ Chapter you are filing under:

- ☐ Chapter 7
☒ Chapter 11
☐ Chapter 12
☐ Chapter 13

☐ Check if this is an amended filing

Official Form 101

Voluntary Petition for Individuals Filing for Bankruptcy

12/22

The bankruptcy forms use *you* and *Debtor 1* to refer to a debtor filing alone. A married couple may file a bankruptcy case together—called a *joint* case—and in joint cases, these forms use *you* to ask for information from both debtors. For example, if a form asks, “Do you own a car,” the answer would be *yes* if either debtor owns a car. When information is needed about the spouses separately, the form uses *Debtor 1* and *Debtor 2* to distinguish between them. In joint cases, one of the spouses must report information as *Debtor 1* and the other as *Debtor 2*. The same person must be *Debtor 1* in all of the forms.

Be as complete and accurate as possible. If two married people are filing together, both are equally responsible for supplying correct information. If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write your name and case number (if known). Answer every question.

Part 1: Identify Yourself

1. Your full name

Write the name that is on your government-issued picture identification (for example, your driver's license or passport).

Bring your picture identification to your meeting with the trustee.

About Debtor 1:

Pasquale

First name

Middle name

Roppo

Last name

Suffix (Sr., Jr, II, III)

About Debtor 2 (Spouse Only in a Joint Case):

First name

Middle name

Last name

Suffix (Sr., Jr, II, III)

2. All other names you have used in the last 8 years

Include your married or maiden names and any assumed, trade names and *doing business as* names.

Do NOT list the name of any separate legal entity such as a corporation, partnership, or LLC that is not filing this petition.

First name

Middle name

Last name

Business name (if applicable)

Business name (if applicable)

First name

Middle name

Last name

Business name (if applicable)

Business name (if applicable)

3. Only the last 4 digits of your Social Security number or federal Individual Taxpayer Identification number (ITIN)

xxx - xx - 4 1 8 8

OR

9xx - xx - _____

xxx - xx - _____

OR

9xx - xx - _____

Debtor 1

Pasquale

Roppo

First Name

Middle Name

Last Name

Case number (if known) _____

About Debtor 1:

About Debtor 2 (Spouse Only in a Joint Case):

4. Your Employer Identification Number (EIN), if any.

EIN

EIN

EIN

EIN

5. Where you live

840 Napa Ln

Number Street

Aurora, IL 60502-8510

City State ZIP Code

County

If your mailing address is different from the one above, fill it in here. Note that the court will send any notices to you at this mailing address.

Number Street

P.O. Box

City State ZIP Code

If Debtor 2 lives at a different address:

Number Street

City State ZIP Code

County

If Debtor 2's mailing address is different from yours, fill it in here. Note that the court will send any notices to you at this mailing address.

Number Street

P.O. Box

City State ZIP Code

6. Why you are choosing this district to file for bankruptcy

Check one:

☒ Over the last 180 days before filing this petition, I have lived in this district longer than in any other district.

☐ I have another reason. Explain.
(See 28 U.S.C. § 1408)

Check one:

☐ Over the last 180 days before filing this petition, I have lived in this district longer than in any other district.

☐ I have another reason. Explain.
(See 28 U.S.C. § 1408)

Debtor 1 **Pasquale** **Roppo** Case number (if known) _____
 First Name Middle Name Last Name

Part 2: Tell the Court About Your Bankruptcy Case

7. **The chapter of the Bankruptcy Code you are choosing to file under** *Check one.* (For a brief description of each, see *Notice Required by 11 U.S.C. § 342(b) for Individuals Filing for Bankruptcy* (Form 2010)). Also, go to the top of page 1 and check the appropriate box.
- ☐ Chapter 7
☒ Chapter 11
☐ Chapter 12
☐ Chapter 13

8. **How you will pay the fee**
- ☒ **I will pay the entire fee when I file my petition.** Please check with the clerk's office in your local court for more details about how you may pay. Typically, if you are paying the fee yourself, you may pay with cash, cashier's check, or money order. If your attorney is submitting your payment on your behalf, your attorney may pay with a credit card or check with a pre-printed address.
- ☐ **I need to pay the fee in installments.** If you choose this option, sign and attach the *Application for Individuals to Pay The Filing Fee in Installments* (Official Form 103A).
- ☐ **I request that my fee be waived** (You may request this option only if you are filing for Chapter 7. By law, a judge may, but is not required to, waive your fee, and may do so only if your income is less than 150% of the official poverty line that applies to your family size and you are unable to pay the fee in installments). If you choose this option, you must fill out the *Application to Have the Chapter 7 Filing Fee Waived* (Official Form 103B) and file it with your petition.

9. **Have you filed for bankruptcy within the last 8 years?**
- ☒ No.
- ☐ Yes. District _____ When _____ Case number _____
 MM / DD / YYYY
- District _____ When _____ Case number _____
 MM / DD / YYYY
- District _____ When _____ Case number _____
 MM / DD / YYYY

10. **Are any bankruptcy cases pending or being filed by a spouse who is not filing this case with you, or by a business partner, or by an affiliate?**
- ☐ No.
- ☒ Yes. Debtor **Nicnat LLC** Relationship to you **Debtor's company**
 District **Northern District of Illinois** When **11/15/2023** Case number, if known **23-15379**
 MM / DD / YYYY
- Debtor **Spike Body Werks, Inc.** Relationship to you **Debtor's Company**
 District **Northern District of Illinois** When **10/17/2023** Case number, if known **23-13885**
 MM / DD / YYYY

11. **Do you rent your residence?**
- ☒ No. Go to line 12.
- ☐ Yes. Has your landlord obtained an eviction judgment against you?
- ☐ No. Go to line 12.
- ☐ Yes. Fill out *Initial Statement About an Eviction Judgment Against You* (Form 101A) and file it as part of this bankruptcy petition.

Debtor 1

Pasquale

Roppo

First Name

Middle Name

Last Name

Case number (if known) _____

Part 3: Report About Any Businesses You Own as a Sole Proprietor

12. Are you a sole proprietor of any full- or part-time business?



No. Go to Part 4.



Yes. Name and location of business

A sole proprietorship is a business you operate as an individual, and is not a separate legal entity such as a corporation, partnership, or LLC.

If you have more than one sole proprietorship, use a separate sheet and attach it to this petition.

Name of business, if any

Number Street

City

State

ZIP Code

Check the appropriate box to describe your business:



Health Care Business (as defined in 11 U.S.C. § 101(27A))



Single Asset Real Estate (as defined in 11 U.S.C. § 101(51B))



Stockbroker (as defined in 11 U.S.C. § 101(53A))



Commodity Broker (as defined in 11 U.S.C. § 101(6))



None of the above

13. Are you filing under Chapter 11 of the Bankruptcy Code, and are you a *small business debtor* or a debtor as defined by 11 U.S.C. § 1182(1)?

For a definition of *small business debtor*, see 11 U.S.C. § 101(51D).



No. I am not filing under Chapter 11.



No. I am filing under Chapter 11, but I am NOT a small business debtor according to the definition in the Bankruptcy Code.



Yes. I am filing under Chapter 11, I am a small business debtor according to the definition in the Bankruptcy Code, and I do not choose to proceed under Subchapter V of Chapter 11.



Yes. I am filing under Chapter 11, I am a debtor according to the definition in § 1182(1) of the Bankruptcy Code, and I choose to proceed under Subchapter V of Chapter 11.

If you are filing under Chapter 11, the court must know whether you are a small business debtor or a debtor choosing to proceed under Subchapter V so that it can set appropriate deadlines. If you indicate that you are a small business debtor or you are choosing to proceed under Subchapter V, you must attach your most recent balance sheet, statement of operations, cash-flow statement, and federal income tax return or if any of these documents do not exist, follow the procedure in 11 U.S.C. § 1116(1)(B).

Debtor 1

Pasquale

Roppo

First Name

Middle Name

Last Name

Case number (if known) _____

Part 4: Report if You Own or Have Any Hazardous Property or Any Property That Needs Immediate Attention

14. Do you own or have any property that poses or is alleged to pose a threat of imminent and identifiable hazard to public health or safety? Or do you own any property that needs immediate attention?



No.



Yes. What is the hazard?

If immediate attention is needed, why is it needed?

For example, do you own perishable goods, or livestock that must be fed, or a building that needs urgent repairs?

Where is the property?

Number Street

City

State

ZIP Code

Debtor 1

Pasquale

Roppo

First Name

Middle Name

Last Name

Case number (if known) _____

Part 5: Explain Your Efforts to Receive a Briefing About Credit Counseling

15. Tell the court whether you have received a briefing about credit counseling.

The law requires that you receive a briefing about credit counseling before you file for bankruptcy. You must truthfully check one of the following choices. If you cannot do so, you are not eligible to file.

If you file anyway, the court can dismiss your case, you will lose whatever filing fee you paid, and your creditors can begin collection activities again.

About Debtor 1:

You must check one:

☒ **I received a briefing from an approved credit counseling agency within the 180 days before I filed this bankruptcy petition, and I received a certificate of completion.**

Attach a copy of the certificate and the payment plan, if any, that you developed with the agency.

☐ **I received a briefing from an approved credit counseling agency within the 180 days before I filed this bankruptcy petition, but I do not have a certificate of completion.**

Within 14 days after you file this bankruptcy petition, you **MUST** file a copy of the certificate and payment plan, if any.

☐ **I certify that I asked for credit counseling services from an approved agency, but was unable to obtain those services during the 7 days after I made my request, and exigent circumstances merit a 30-day temporary waiver of the requirement.**

To ask for a 30-day temporary waiver of the requirement, attach a separate sheet explaining what efforts you made to obtain the briefing, why you were unable to obtain it before you filed for bankruptcy, and what exigent circumstances required you to file this case.

Your case may be dismissed if the court is dissatisfied with your reasons for not receiving a briefing before you filed for bankruptcy.

If the court is satisfied with your reasons, you must still receive a briefing within 30 days after you file. You must file a certificate from the approved agency, along with a copy of the payment plan you developed, if any. If you do not do so, your case may be dismissed.

Any extension of the 30-day deadline is granted only for cause and is limited to a maximum of 15 days.

☐ **I am not required to receive a briefing about credit counseling because of:**

☐ **Incapacity.** I have a mental illness or a mental deficiency that makes me incapable of realizing or making rational decisions about finances.

☐ **Disability.** My physical disability causes me to be unable to participate in a briefing in person, by phone, or through the internet, even after I reasonably tried to do so.

☐ **Active duty.** I am currently on active military duty in a military combat zone.

If you believe you are not required to receive a briefing about credit counseling, you must file a motion for waiver of credit counseling with the court.

About Debtor 2 (Spouse Only in a Joint Case):

You must check one:

☐ **I received a briefing from an approved credit counseling agency within the 180 days before I filed this bankruptcy petition, and I received a certificate of completion.**

Attach a copy of the certificate and the payment plan, if any, that you developed with the agency.

☐ **I received a briefing from an approved credit counseling agency within the 180 days before I filed this bankruptcy petition, but I do not have a certificate of completion.**

Within 14 days after you file this bankruptcy petition, you **MUST** file a copy of the certificate and payment plan, if any.

☐ **I certify that I asked for credit counseling services from an approved agency, but was unable to obtain those services during the 7 days after I made my request, and exigent circumstances merit a 30-day temporary waiver of the requirement.**

To ask for a 30-day temporary waiver of the requirement, attach a separate sheet explaining what efforts you made to obtain the briefing, why you were unable to obtain it before you filed for bankruptcy, and what exigent circumstances required you to file this case.

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Any extension of the 30-day deadline is granted only for cause and is limited to a maximum of 15 days.

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☐ **Disability.** My physical disability causes me to be unable to participate in a briefing in person, by phone, or through the internet, even after I reasonably tried to do so.

☐ **Active duty.** I am currently on active military duty in a military combat zone.

If you believe you are not required to receive a briefing about credit counseling, you must file a motion for waiver of credit counseling with the court.

Debtor 1

Pasquale

Roppo

First Name

Middle Name

Last Name

Case number (if known) _____

Part 6: Answer These Questions for Reporting Purposes

16. What kind of debts do you have?

16a. Are your debts primarily consumer debts? *Consumer debts* are defined in 11 U.S.C. § 101(8) as "incurred by an individual primarily for a personal, family, or household purpose."

- ☒ No. Go to line 16b.
☐ Yes. Go to line 17.

16b. Are your debts primarily business debts? *Business debts* are debts that you incurred to obtain money for a business or investment or through the operation of the business or investment.

- ☐ No. Go to line 16c.
☒ Yes. Go to line 17.

16c. State the type of debts you owe that are not consumer debts or business debts.

17. Are you filing under Chapter 7?

☒ No. I am not filing under Chapter 7. Go to line 18.

Do you estimate that after any exempt property is excluded and administrative expenses are paid that funds will be available for distribution to unsecured creditors?

- ☐ Yes. I am filing under Chapter 7. Do you estimate that after any exempt property is excluded and administrative expenses are paid that funds will be available to distribute to unsecured creditors?
- ☐ No
☐ Yes

18. How many creditors do you estimate that you owe?

- ☒ 1-49 ☐ 1,000-5,000 ☐ 25,001-50,000 ☐ 50,000-100,000 ☐ More than 100,000
☐ 50-99 ☐ 5,001-10,000
☐ 100-199 ☐ 10,001-25,000
☐ 200-999

19. How much do you estimate your assets to be worth?

- ☐ \$0-\$50,000 ☐ \$1,000,001-\$10 million ☐ \$500,000,001-\$1 billion
☐ \$50,001-\$100,000 ☐ \$10,000,001-\$50 million ☐ \$1,000,000,001-\$10 billion
☒ \$100,001-\$500,000 ☐ \$50,000,001-\$100 million ☐ \$10,000,000,001-\$50 billion
☐ \$500,001-\$1 million ☐ \$100,000,001-\$500 million ☐ More than \$50 billion

20. How much do you estimate your liabilities to be?

- ☐ \$0-\$50,000 ☒ \$1,000,001-\$10 million ☐ \$500,000,001-\$1 billion
☐ \$50,001-\$100,000 ☐ \$10,000,001-\$50 million ☐ \$1,000,000,001-\$10 billion
☐ \$100,001-\$500,000 ☐ \$50,000,001-\$100 million ☐ \$10,000,000,001-\$50 billion
☐ \$500,001-\$1 million ☐ \$100,000,001-\$500 million ☐ More than \$50 billion

Part 7: Sign Below

For you

I have examined this petition, and I declare under penalty of perjury that the information provided is true and correct.

If I have chosen to file under Chapter 7, I am aware that I may proceed, if eligible, under Chapter 7, 11, 12, or 13 of title 11, United States Code. I understand the relief available under each chapter, and I choose to proceed under Chapter 7.

If no attorney represents me and I did not pay or agree to pay someone who is not an attorney to help me fill out this document, I have obtained and read the notice required by 11 U.S.C. § 342(b).

I request relief in accordance with the chapter of title 11, United States Code, specified in this petition.

I understand making a false statement, concealing property, or obtaining money or property by fraud in connection with a bankruptcy case can result in fines up to \$250,000, or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

X 

Pasquale Roppo, Debtor 1

Executed on 06/20/2024

MM/ DD/ YYYY

Debtor 1

Pasquale

Roppo

First Name

Middle Name

Last Name

Case number (if known) _____

For your attorney, if you are represented by one

If you are not represented by an attorney, you do not need to file this page.

I, the attorney for the debtor(s) named in this petition, declare that I have informed the debtor(s) about eligibility to proceed under Chapter 7, 11, 12, or 13 of title 11, United States Code, and have explained the relief available under each chapter for which the person is eligible. I also certify that I have delivered to the debtor(s) the notice required by 11 U.S.C. § 342(b) and, in a case in which § 707(b)(4)(D) applies, certify that I have no knowledge after an inquiry that the information in the schedules filed with the petition is incorrect.

X

/s/ John F Hiltz, III

Signature of Attorney for Debtor

Date **06/20/2024**

MM / DD / YYYY

John F Hiltz, III

Printed name

Leibowitz, Hiltz & Zanzig, LLC

Firm name

53 W Jackson Blvd Ste 1301

Number Street

Chicago

City

IL

State

60604-3552

ZIP Code

Contact phone **(312) 566-9008**

Email address **john@lakelaw.com**

6289744

Bar number

IL

State

Addendum to Petition Line 10: Additional Related Cases

Debtor: Geneva Repair Shop

Case No: 23-13878

Filed: October 17, 2023

District: Northern District of Illinois Bankruptcy Court

IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION (CHICAGO)

IN RE: **Roppo, Pasquale**

CASE NO

CHAPTER 11

VERIFICATION OF CREDITOR MATRIX

The above named Debtor hereby verifies that the attached list of creditors is true and correct to the best of his/her knowledge.

Date 06/20/2024 Signature *Pasquale Roppo*
Pasquale Roppo, Debtor

Amex

Correspondence/Bankruptcy
PO Box 981540
El Paso, TX 79998-1540

Barclays Bank Delaware

PO Box 8803
Wilmington, DE 19899

Byline Bank

180 N La Salle St Ste 300
Chicago, IL 60601-3110

Capital One Auto Finance

Attn Bankruptcy
7933 Preston Rd
Plano, TX 75024-2302

Capital One/ Menards

Attn: Bankruptcy
PO Box 30285
Salt Lake City, UT 84130-0285

Chase Card Services

Attn: Bankruptcy
PO Box 15298
Wilmington, DE 19850

Citibank/ The Home Depot

Citicorp Cr Srvs/Centralized Bankruptcy
PO Box 790040
St Louis, MO 63179-0040

Comenity Bank

Attn: Bankruptcy
PO Box 182125
Columbus, OH 43218

Costco Citi Card

Attn: Bankruptcy
PO Box 6500
Sioux Falls, SD 57117

Discover Financial

Attn: Bankruptcy
PO Box 3025
New Albany, OH 43054

Goldman Sachs And Co

Goldman Sachs Bank Usa
Philadelphia, PA 19176

Goldman Sachs Bank USA

Attn: Bankruptcy
PO Box 70379
Philadelphia, PA 19176-0379

**Illinois Department of
Revenue**

BANKRUPTCY UNIT
Po Box 19035
Springfield, IL 62794-9035

Internal Revenue Service

Central Insolvency Function
Po Box 7346
Philadelphia, PA 19101-7346

Matco Tools

Attn: Bankruptcy 4403 Allen Rd
Stow, OH 44224

SoFi

Attn: Bankruptcy Attn: Bankruptcy
2750 East Cottonwood Parkway , Ste 300
Salt Lake City, UT 84121

Sofi Lending Corp/ MOHELA

Attn: Bankruptcy
PO Box 1022
Chesterfield, MO 75265-4158

Syncb/ Harbor Freight

Attn: Bankruptcy
PO Box 965060
Orlando, FL 32896-5060

Synchrony Bank/ Amazon

Attn: Bankruptcy
PO Box 965060
Orlando, FL 32896-5060

Synchrony Bank/ Gap

Attn: Bankruptcy
PO Box 965060
Orlando, FL 32896-5060

Telecom Self-reported

Po Box 4500
Allen, TX 75013

Truist Bank

Attn: Bankruptcy
200 Pine St W
Wilson, NC 27893

US Bank

PO Box 108
Saint Louis, MO 63166

US Bank/ RMS

Attn: Bankruptcy
PO Box 5229
Cincinnati, OH 45201-5229

Utility Self-reported

Po Box 4500
Allen, TX 75013

B2030 (Form 2030) (12/15)

United States Bankruptcy Court
Northern District of Illinois

In re Roppo, Pasquale

Case No. _____

Debtor

Chapter 11

DISCLOSURE OF COMPENSATION OF ATTORNEY FOR DEBTOR

1. Pursuant to 11 U.S.C. § 329(a) and Fed. Bankr. P. 2016(b), I certify that I am the attorney for the above named debtor(s) and that compensation paid to me within one year before the filing of the petition in bankruptcy, or agreed to be paid to me, for services rendered or to be rendered on behalf of the debtor(s) in contemplation of or in connection with the bankruptcy case is as follows:

☐ **FLAT FEE**

For legal services, I have agreed to accept _____

Prior to the filing of this statement I have received _____

Balance Due _____

☒ **RETAINER**

For legal services, I have agreed to accept and received a retainer of _____ **\$10,000.00**

The undersigned shall bill against the retainer at an hourly rate of _____ **\$550.00**

[Or attach firm hourly rate schedule.] Debtor(s) have agreed to pay all Court approved fees and expenses exceeding the amount of the retainer.

2. \$1,738.00 of the filing fee has been paid.

3. The source of the compensation paid to me was:

☒ Debtor ☐ Other (specify)

4. The source of compensation to be paid to me is:

☒ Debtor ☐ Other (specify)

5. ☒ I have not agreed to share the above-disclosed compensation with any other person unless they are members and associates of my law firm.

☐ I have agreed to share the above-disclosed compensation with a other person or persons who are not members or associates of my law firm. A copy of the agreement, together with a list of the names of the people sharing in the compensation, is attached.

6. In return for the above-disclosed fee, I have agreed to render legal service for all aspects of the bankruptcy case, including:

- a. Analysis of the debtor's financial situation, and rendering advice to the debtor in determining whether to file a petition in bankruptcy;

B2030 (Form 2030) (12/15)

- b. Preparation and filing of any petition, schedules, statements of affairs and plan which may be required;
 - c. Representation of the debtor at the meeting of creditors and confirmation hearing, and any adjourned hearings thereof;
7. By agreement with the debtor(s), the above-disclosed fee does not include the following services:

See Attachment

CERTIFICATION	
I certify that the foregoing is a complete statement of any agreement or arrangement for payment to me for representation of the debtor(s) in this bankruptcy proceeding.	
<u>06/20/2024</u> <i>Date</i>	<u>/s/ John F Hiltz, III</u> John F Hiltz, III <i>Signature of Attorney</i> <div style="text-align: right; padding-right: 20px;">Bar Number: 6289744 Leibowitz, Hiltz & Zanzig, LLC 53 W Jackson Blvd Ste 1301 Chicago, IL 60604-3552 Phone: (312) 566-9008</div> <div style="text-align: center; padding-top: 10px;"><u>Leibowitz, Hiltz & Zanzig, LLC</u> <i>Name of law firm</i></div>



VIA EMAIL TO: pasquale@genevabodyshop.com

Pasquale Roppo
450 Kehoe Blvd
Carol Stream, IL 60188

June 17, 2024

Re: Engagement Letter (Chapter 11 Bankruptcy Filing)

Dear Mr. Roppo:

Thank you for retaining Leibowitz, Hiltz & Zanzig LLC ("Lakelaw"). The purpose of this letter (the "Agreement") is to set forth our mutual understanding as to the nature and scope of the legal services that Lakelaw will provide to you and the terms on which Lakelaw will render those services, including the fees and costs for such services. Please read this letter carefully. Please be advised that you have the right to retain a separate and independent attorney to represent you with respect to this Agreement. If this Agreement is acceptable, please execute it below and return it to us. Our retention is subject to approval by the Bankruptcy Court.

1. ENGAGEMENT AND SCOPE OF LEGAL SERVICES TO BE PERFORMED.

Pasquale Roppo ("Client") retains Lakelaw to represent Client in a potential Chapter 11 filing, including pre-filing planning and representation in and during the case (the "Matter"). Any additional matters, including any adversary proceedings, must be covered by a separate written agreement. Client is aware that the debt limitations for SubChapter V are set to change on June 21, 2024. The ability of Lakelaw to file a SubChapter V case for Client depends on Client retaining Lakelaw in sufficient time to file the Matter. This letter must be returned with the initial retainer described below and the information necessary to complete the emergency petition **no later** than Wednesday June 19 in order to file the Matter in advance of June 21.

2. FEES AND COSTS.

We recognize that payment terms are subject to approval of the Bankruptcy Court and will abide by all relevant orders and procedures. Subject to such approval, Client agrees to pay Lakelaw as follows: Lakelaw will charge by the hour at its prevailing rates for time its personnel devotes to the Matter. For matters of this type, Lakelaw charges \$550 per hour for John Hiltz, who will be responsible for the Matter. These rates are subject to periodic change at Lakelaw's discretion, but will not change more than once per year. The rates are the customary rates Lakelaw charges for similar matters.

You authorize Lakelaw to incur costs and expenses deemed necessary by Lakelaw to perform legal services under this Agreement. You agree to pay for those costs and expenses as they are charged to Lakelaw. Examples of such costs and expenses include court and filing fees, transcript costs, court reporter fees, postage, copying charges, delivery charges and mileage. **Please note, such costs and expenses are in addition to the legal fees described above.** Reimbursement of these costs are also subject to court approval.

3. BILLING ARRANGEMENTS

Client will remit to Lakelaw a refundable retainer in the amount of \$10,000 for representation in the Matter, inclusive of the filing fee for the Matter which is \$1,738. This amount will be held in Lakelaw's client trust account until earned. Unless otherwise instructed by the Court, Lakelaw will bill monthly. Amounts due prior to filing the Matter will be paid to Lakelaw in advance of filing. Lakelaw understands that post-petition fees incurred on behalf of Client will be subject to Court approval. Client understands that receipt of the retainer is required prior to work beginning on the Matter.

4. DISCLAIMER OF GUARANTEE

Lakelaw has made no promise or guarantees to Client about the outcome of the representation undertaken by Lakelaw. While we will endeavor to provide Client with reasoned judgment and advice at all times, we cannot guarantee a particular outcome of any engagement and thus cannot guarantee that the ultimate outcome will be consistent with the Client's wishes.

5. TERMINATION OF REPRESENTATION

Either Lakelaw or Client may terminate this engagement at any time for any reason, subject on our part to applicable rules of professional conduct and approval by the Bankruptcy Court. Lakelaw expressly reserves the right to withdraw from representation if Client has misrepresented or failed to disclose material facts, or if we disagree about the course of action which should be pursued. Notwithstanding any termination of this Agreement, Client will remain liable for services and costs incurred prior to any such termination. In the event of a bankruptcy filing, or where court approval is required for termination of representation, Lakelaw will comply with relevant court orders regarding representation.

6. WARRANTY AND REPRESENTATION

The undersigned each represents and warrants that they have taken all actions and obtained all authorizations, consents and approvals as are conditions precedent to their authority to execute this Agreement and thus warrant that they are fully authorized to bind the party for which they execute this Agreement. Mr. Terletsky warrants that he has authority to authorize Client to file for bankruptcy protection.

7. Entire Agreement

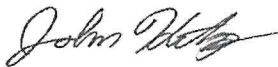
This Agreement constitutes the entire agreement of the parties as to the subject matter addressed. The undersigned acknowledge that there are no communications or understandings, oral or written, contrary, different or which in any way restrict this Agreement. The undersigned further acknowledge

that all prior agreements, communications, and understandings within the scope of the subject matter of this Agreement are, upon execution of this Agreement, superseded, null and void.

8. CONCLUSION

We thank you for your trust in us and look forward to a productive relationship on this Matter. If you agree that this letter correctly states the terms of our agreement, please sign and return to us for our files. If you have any questions or concerns, do not hesitate to contact us at your earliest convenience.

Sincerely,



John F. Hiltz
Member

By: _____

Pasquale Roppo

Date: _____

6/18/2024